

Re: MB Docket No 04-232
Dear FCC,

It is our opinion that the proposal from the FCC for all stations to record and retain their programming for 60-90 days is overly burdensome.

As a group owner of several non-commercial educational stations (many of which are in rural communities) and as a non-profit organization, we are dependent on listener contributions. Requiring each of these stations to record and store programming for 60-90 days would require a further stretching of donated dollars which are already being stretched. In addition, having obtained main studio waivers for these stations this recording and storing of programming would present an undue hardship.

Further, along with the non-commercial educational radio stations, we also operate a television station following the educational, non-commercial guidelines. TV already has a financial hardship presented by the transition to digital and requiring the recording and storing of programming would present an additional un-due burden.

Perhaps the Commission should instead look at ways to require stations that have been called into question on indecency matters be required to record and store programming for a set period of time rather than indicting the whole broadcast industry.

Sincerely,

Vic Eliason
Vice President
VCY America, Inc.